

Lipson Neilson P.C.
9900 Covington Cross Drive, Suite 120
Las Vegas, Nevada 89144
(702) 382-1500 FAX: (702) 382-1512

LIPSON NEILSON P.C.
JOSEPH P. GARIN, ESQ.
Nevada Bar No. 6653
MEGAN H. HUMMEL, ESQ.
Nevada Bar No. 12404
AMANDA A. EBERT, ESQ.
Nevada Bar No. 12731
9900 Covington Cross Drive, Suite 120
Las Vegas, Nevada 89144
(702) 382-1500 - Telephone
(702) 382-1512 - Facsimile
jgarin@lipsonneilson.com
mhummel@lipsonneilson.com
aebert@lipsonneilson.com

*Attorneys for Defendant
Schroeter Goldmark & Bender, P.S.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DIAMOND RESORTS U.S. COLLECTION
DEVELOPMENT, LLC, a Delaware limited
liability company, and DIAMOND RESORTS
MANAGEMENT,

Plaintiffs,

vs.

REED HEIN & ASSOCIATES, LLC d/b/a/
TIMESHARE EXIT TEAM, a Washington
limited liability company; BRANDON REED,
an individual and citizen of the State of
Washington; TREVOR HEIN, an individual
and citizen of Canada; THOMAS
PARENTEAU, an individual and citizen of the
State of Washington; HAPPY HOUR MEDIA
GROUP, LLC, a Washington limited liability
company; MITCHELL R. SUSSMAN &
ASSOCIATES, an individual and citizen of
the State of California; SCHROETER,
GOLDMARK & BENDER, P.S., a
Washington professional services
corporation; and KEN B. PRIVETT, ESQ., a
citizen of the State of Oklahoma,

Defendants.

CASE NO.: 2:17-cv-03007-APG-VCF

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE REPLY TO
PLAINTIFF'S OPPOSITION TO
DEFENDANT SGB'S MOTION FOR
PROTECTIVE ORDER [ECF NO. 216]**

(First Stipulation)

///

///

**STIPULATION AND ORDER TO EXTEND TIME TO FILE REPLY TO PLAINTIFF'S
OPPOSITION TO DEFENDANT SGB'S MOTION FOR PROTECTIVE ORDER
[ECF NO. 216]**

Pursuant to Local Rule 7-1, Plaintiff DIAMOND RESORTS U.S. COLLECTION DEVELOPMENT, LLC ("Plaintiff") and Defendant SCHROETER, GOLDMARK & BENDER, P.S. ("Defendant"), by and through their respective counsel, agree and stipulate as follows:

1. On April 24, 2020, Defendant filed its Motion for Protective Order [ECF No. 196].

2. On May 8, 2020, Plaintiff filed its Opposition to Defendant SGB'S Motion for Protective Order [ECF 216].

3. The current deadline for Defendant to file Reply to Plaintiff's Opposition is May 15, 2020.

4. The parties have agreed that Defendant may have an additional period to file its Reply to Plaintiff's Opposition to Defendant SGB'S Motion for Protective Order, making the deadline therefor to be on **Tuesday, May 19, 2020**.

5. Pursuant to Local Rule 6-1(b), the parties state the reason for the extension is that counsel requires more time to evaluate and respond to the Plaintiffs' Opposition to Defendant SGB'S Motion for Protective Order.

///

///

///

///

///

///

///

///

///

6. The parties have entered into this agreement in good faith and not for purposes of delay. This request will not cause any prejudice to the parties in this matter.

Dated this 12th day of May, 2020.

Dated this 12th day of May, 2020.

GREENSPOON MARDER LLP

LIPSON NEILSON P.C.

/s/ Phillip A. Silvestri

/s/ Megan H. Hummel

Phillip A. Silvestri, Esq. (Bar No. 11276)
3993 Howard Hughes Pkwy., Ste. 400
Las Vegas, NV 89169

Joseph P. Garin, Esq. (Bar No. 6653)
Megan H. Hummel, Esq. (Bar No. 12404)
Amanda A. Ebet (Bar No. 1731)
9900 Covington Cross Drive, Suite 120
Las Vegas, Nevada 89144

Richard W. Epstein, Esq.
(Admitted Pro Hac Vice)
Jeffrey Backman, Esq.
(Admitted Pro Hac Vice)
Michelle E. Durieux, Esq.
(Admitted Pro Hac Vice)
200 East Broward Blvd., Ste. 1800
Fort Lauderdale, FL 33301

*Attorneys for Defendant
Schroeter Goldmark & Bender, P.S.*

COOPER LEVENSON, P.A.
Kimberly Maxson-Rushton, Esq.
Nevada Bar No. 5065
Gregory A. Kraemer, Esq.
Nevada Bar No. 10911
R. Scott Rasmussen, Esq.
Nevada Bar No. 6100
1835 Village Center Circle
Las Vegas, NV 89134

Attorneys for Plaintiffs

ORDER

IT IS SO ORDERED.

5-13-2020

DATED: _____

UNITED STATES MAGISTRATE JUDGE